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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) No. CR-11-0905 SBA
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED]
16 JORDAN MOORE and) ORDER TO CONTINUE STATUS
17 SYLVESTER MOORE,) HEARING TO MARCH 21, 2014
18 Defendant.)
Date: February 14, 2014
Time: 9:30 a.m.
Court: Hon. Kandis A. Westmore

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20 The above-captioned matter is set on February 14, 2014 before this Court for a status or change-
21 of-plea hearing. The parties request that this Court vacate that date and set this matter for status or
22 change-of-plea hearing on March 21, 2014 at 9:30 a.m and that the Court exclude time under the Speedy
23 Trial Act between the date of this stipulation and March 21, 2014. The parties stipulate that the time is
24 excludable from the time limitations of the Speedy Trial Act because the interests of justice are served
25 by granting a continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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STIP. REQ. TO CONTINUE SENTENCING HEARING
NO. CR-11-0905 SBA

1 This continuance will allow the reasonable time necessary for effective preparation and
 2 continuity of counsel, taking into account the exercise of due diligence. Counsel for Sylvester Moore
 3 has two approximately two-week trials set between now and March 21. Counsel for the government has
 4 prepared a Superseding Information incorporating the out-of-district robberies for a global resolution,
 5 has drafted plea agreements addressing all the robberies, and needs to obtain written permission from the
 6 District of Iowa, San Joaquin County, and Santa Clara County for a global resolution in this Court. The
 7 defense attorneys continue to review evidence of robberies in several different jurisdictions to advise
 8 their clients about a global resolution.

9 As such, the parties respectfully request that the time between the date of this stipulation and
 10 March 21, 2014 be excluded under U.S.C. § 3161(h)(7)(A) and (B)(iv).

12 DATED: February 13, 2014

Respectfully submitted,

MELINDA HAAG United States Attorney <u>/s/ Christina McCall</u> CHRISTINA McCALL Assistant U. S. Attorney	<u>/s/ Garrick S. Lew</u> GARRICK S. LEW Attorney for Jordan Moore	<u>/s/ Paul Demeester</u> PAUL DEMEESTER Attorney for Sylvester Moore
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ORDER

19 Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS
 20 that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of
 21 justice, pursuant to 18 U.S.C. sections 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted
 22 under the Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is
 23 continued until March 21, 2014 at 9:30 a.m., and time is excluded until March 21, 2014.

24 IT SO ORDERED.

26 DATED: 2/13/14


 The Hon. Kandis A. Westmore
 United States Magistrate Court Judge